1 2 3 4 5	Gillian M. Ross, Bar No. 127116 Eugene M. Pak, Bar No. 168699 Gregory K. Jung, Bar No. 203350 WENDEL, ROSEN, BLACK & DEAN LLP 1111 Broadway, 24th Floor Oakland, California 94607 Telephone: (510) 834-6600 Fax: (510) 834-1928 Email: epak@wendel.com		
6 7	Attorneys for Defendants Mohammed Karwash and Hassan Ibrahim		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11			
12	BELCAN ENGINEERS,	Case No. 3:09-CV-02891 MMC	
13	Plaintiff,	STIPULATED MOTION TO AMEND CASE MANAGEMENT CONFERENCE	
14	VS.	ORDER SCHEDULE [L.R. 16-2]	
15	MOHAMMED KARWASH, TOM LINN dba TOM LINN DRAFTING & DESIGN,	[274 10 2]	
16	JOSE JIMENEZ dba J&M DESIGN, WILEY R. CHITWOOD, HASSAN C.		
17	IBRAHIM, and SOUTHWAY ENGINEERING & CONSTRUCTION,		
18	Defendants.		
19	·		
20			
21	Pursuant to Local Rule 16-2(d), Plaintiff Belcan Engineers ("Plaintiff") and Defendants		
22	Mohammed Karwash and Hassan Ibrahim ("Defendants") (collectively referred to as the		
23	"Parties") hereby stipulate and jointly request that the deadlines in this action be extended. <sup>1</sup>		
24	Good cause exists for such extension as the Parties have reached a settlement that they are		
25	currently memorializing in writing which requires performance of certain settlement terms over a		
26	period of approximately ten (10) months in exchange for a dismissal of the entire action.		
27 28	The other defendants in this action ha	ave not appeared and have defaulted.	

Accordingly, the Parties respectfully request that the Court's Scheduling Order of April 27, 2012 be amended to allow for full performance of the settlement terms prior to dismissal of this action. The Parties request that the current deadlines in this action be re-set to the following year as follows:

Event	<b>Current Deadline</b>	Proposed Deadline
Fact Discovery Cut-Off	July 27, 2012	July 26, 2013
Expert Disclosure	September 1, 2012	September 3, 2013
Rebuttal Expert Disclosure	September 20, 2012	September 24, 2013
Joint Statement	October 5, 2012	October 7, 2013
Further Status Conference	October 12, 2012 at 10:30 a.m.	October 11, 2013 at 10:30 a.m.
Expert Discovery Cutoff	October 19, 2012	October 22, 2013
Dispositive Motion Deadline	November 2, 2012	November 4, 2013
Meet and Confer	December 17, 2012	December 16, 2013
Pretrial Conference	January 22, 2013 at 3:00 p.m.	January 21, 2013 at 3:00 p.m.
Trial	February 4, 2013 at 9 a.m.	February 4, 2013 at 9 a.m.
	(3 days)	(3 days)

## IT IS SO STIPULATED:

Dated: June 1, 2012	WENDEL, ROSEN, BLACK & DEAN LLP

21	By: /s/ Eugene M. Pak
21	Eugene M. Pak
22	Attorneys for Defendants
22	Mohammed Karwash and Hassan Ibrahim

Dated: June 1, 2012	THE MORALES LAW FIRM
Daicu. June 1. 2012	

25	By: /s/ David P. Morales
26	David P. Morales Attorneys for Plaintiff
27	Belcan Engineers

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1	PURSUANT TO STIPULATION, IT IS SO ORDERED, with the exception that the pretrial
2	conference is continued to January 21, 2014 and the trial is continued to February 3, 2014.
3	Dated: June <u>6</u> , 2012
4	By: Mafine M. Chesney  United States District Court Judge
5	Judge Maxine M. Chesney United States District Court Judge
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2419110.1	STIPULATED MOTION TO AMEND CASE  MANAGEMENT CONFERENCE ORDER SCHEDULE 3 -  Case No. CV 03 2891 MMC

Wendel, Rosen, Black & Dean LLP 1111 Broadway, 24th Floor Oakland, CA 94 607